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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
SHAWN NEWKIRK,
Defendant.

2:10-cr-547-RLH-PAL-27

**STIPULATION TO EXTEND
DEADLINES IN THIS COURT'S
MARCH 3, 2015 ORDER BY
THIRTY (30) DAYS**

The United States of America, by Assistant United States Attorney Elizabeth Olson White, and Defendant Shawn Newkirk, by Assistant Federal Public Defender Nisha Brooks-Whittington, submit the following Joint Stipulation to extend, by thirty (30) days, all of the deadlines set in this Court's Order dated March 3, 2015. *See* CR 907.

The parties agree and stipulate to the following:

1. On November 13, 2012, this Court sentenced Defendant to 48 months' imprisonment on his conviction for drug-related offenses. CR 722.

2. On February 27, 2015, Defendant filed a *pro se* motion for a reduction of sentence pursuant to 18 U.S.C. § 3582(c)(2) in light of Guidelines Amendment 782. CR 906.

3. On March 3, 2015, this Court issued an Order appointing the Federal Public Defender to represent Defendant, and setting deadlines. Specifically, the Court ordered the Probation Office to provide certain documents to the parties within 30 days (i.e., by April 2, 2015) and ordered the

1 Federal Public Defender to file any appropriate motion or stipulation within 120 days (i.e., by
2 July 1, 2015). CR 907.

3 4. The parties are seeking additional time to obtain and review the sentencing transcript
4 to determine the guideline calculations.

5 5. For the reason stated above, the parties respectfully request that the Court issue an
6 order extending the deadlines in the Court's March 3, 2015 Order, by thirty (30) days.

7 DATED this 1st day of July, 2015.

Respectfully submitted,

10 RENE L. VALLADARES
Federal Public Defender

/s/ Nisha Brooks-Whittington

**NISHA BROOKS-WHITTINGTON,
Assistant Federal Public Defender**

DANIEL G. BOGDEN
United States Attorney

/s/ Elizabeth O. White

ELIZABETH O. WHITE,
Appellate Chief and
Assistant United States Attorney

16 || IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: July 2, 2015